UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SEP 8 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Art Dalla Piazza
Department of Environmental Resources
Bureau of Solid Waste Management
7th Floor, Fulton Bldg.
P.O. Box 2063
Harrisburg, PA 17120

Site Inspections

Re: Penn Rare Metals PA-1216
Dublin Water Supply
Hilltown Quarry PA-655

Preliminary Assessments

Acro-Matic Inc. PA-2484
National Can Company PA-2454
Prior Coated Metals PA-2437
Brintec Corp. PA-2401
CRC Chemicals Inc. PA-2403

Dear Mr. Dalla Piazza:

We are forwarding to you a copy of the final reports for the above referenced projects.

If there are any questions concerning the report please call me at 215-597-1073.

Sincerely,

Paul Racette

Paul Racette
Pre-Remedial Section

Enclosure

cc: George Danyliw, DER (w/encls)

R-585-5-9-49

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT OF
NATIONAL CAN CORPORATION
PREPARED UNDER

TDD NO. F3-8903-38
EPA NO. PA-2454
CONTRACT NO. 68-01-7346

FOR THE

HAZARDOUS SITE CONTROL DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

AUGUST 21, 1989

NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY	REVIEWED BY	APPROVED BY
DONNA MCKEEVER PROJECT MANAGER	CARL RODZEWICH SECTION SUPERVISOR	GARTH GLENN REGIONAL OPERATIONS MANAGER, FIT 3

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APPENDICES

SECTION 1

1.0 INTRODUCTION

1.1 Authorization

NUS Corporation performed this work under Environmental Protection Agency Contract No. 68-01-7346. This specific report was prepared in accordance with Technical Directive Document No. F3-8903-38 for the National Can Corporation site, located in Morrisville, Pennsylvania.

1.2 Scope of Work

NUS FIT 3 was tasked to conduct an Environmental Priorities Initiative (EPI) preliminary assessment of the subject site.

1.3 Summary

The National Can Corporation site is located nearly three miles southeast of the Morrisville city limits in Falls Township, Bucks County, Pennsylvania. The site consists of approximately 16-1/2 acres of land located in a large industrial park. U.S. Steel, which owns the subject site, has a facility located between 1/2 and two miles east and southeast of the site.

In 1967, National Can Corporation (currently known as American National Can Company) leased the subject property for 99 years from U.S. Steel. A building was constructed on site, and National Can Corporation began metal-can-manufacturing processes at the facility. In 1983, after a few years of scaling down its operations, National Can Corporation vacated the facility and subsequently subleased the building as a warehouse. The building currently stores Lenox china, automobile tires, and various paper products.

Waste materials produced by National Can Corporation at the subject facility included waste solvents, waste vinyls, waste paint primers, waste varnishes, and a waste end sealing compound. Wastes were not stored for more than 90 days. Five solid waste management units (SWMUs) have been identified for National Can Corporation, and all of them handled hazardous materials. They are underground storage tanks, the drum storage room, the drum storage pad, the waste solvent tank, and the hazardous waste storage area. According to available information, no spills have been reported at the site. A detailed discussion of the SWMUs and wastes managed can be found in section 4.1.

National Can Corporation submitted a Part A Hazardous Waste Permit application on November 14, 1980, as required by RCRA. On March 14, 1983, the company asked to withdraw its Part A permit application for a storage facility. Later, after manufacturing operations at the facility ceased, National Can Corporation requested the deletion of its facility as a generator. On July 19, 1984, the Pennsylvania Department of Environmental Resources (PA DER) determined that the subject facility was not a treatment, storage, and disposal (TSD) facility. On May 5, 1989, NUS FIT 3 performed an EPI preliminary assessment of the site. The site visit included a tour of the former National Can Corporation facility and the former SWMU areas and interviews with the site representative.

An estimated 7,860 people live within a 3-mile radius of the site. Seven public water distribution systems supply water, obtained from surface water intakes and groundwater wells, to most of the population within the study area. However, a few residents probably depend on private home wells for their potable water supply.

SECTION 2

2.0 THE SITE

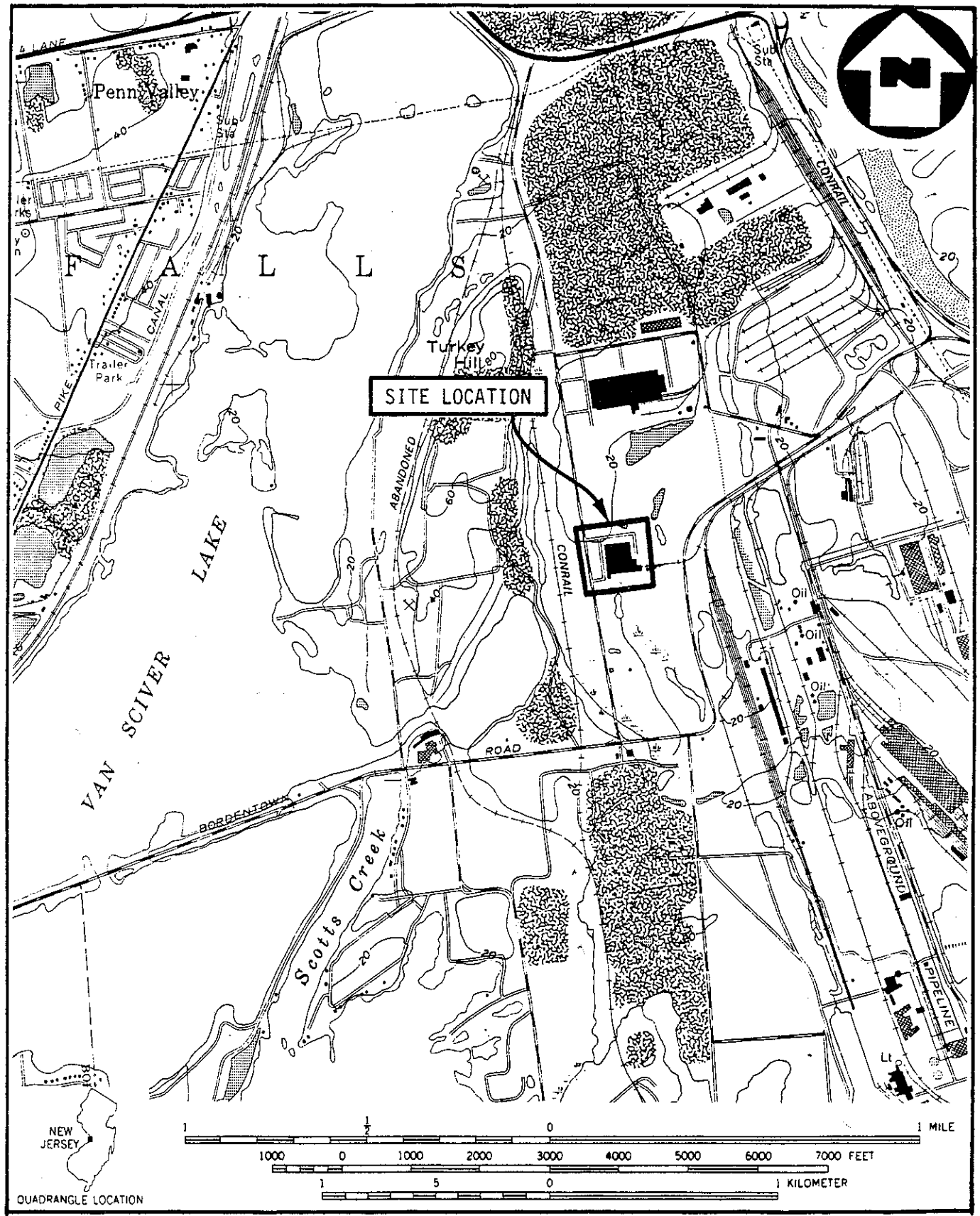
2.1 Location

The National Can Corporation site is located in Morrisville, Falls Township, Bucks County, Pennsylvania (see figure 2.1, page 2-2). The facility can be located on the United States Geological Survey (U.S.G.S.) 7.5 minute series Trenton West, Pennsylvania - New Jersey topographic map at 40° 9' 35" north latitude and 74° 46' 7" west longitude. It can be found on the quadrangle by measuring from the southeastern corner 2-1/2 inches east and 6-1/4 inches north.[1]

2.2 Site Layout

The subject site is located approximately three miles southeast of the Morrisville, Pennsylvania city limits in a large industrial park. Immediately surrounding the property are grassy areas with scattered trees and shrubs. Approximately 300 feet south of the facility is a stone- and gravel-filled area. Formerly, this area south of the facility comprised a grassy, marshy area. A small stream and pond were also located here. Approximately 400 feet northeast of the on-site building is a pond that covers almost 2/3 acre. The U.S. Steel facility abuts the subject site to the east.[1,2]

Access to the site is easily obtained by using Newford Mill Road, which borders the site to the west (see figure 2.2, page 2-3). Two driveways lead eastwardly from the road approximately 200 feet to a parking lot that is in front of the approximately 31,000-square-foot on-site building. The northernmost driveway continues eastwardly, past the parking lot and parallel to the northern side of the building. It turns to the south at the back, or eastern, side of the building and ends at the former hazardous waste storage area. Some of the front, or western, side of the building is still used for office space. The large central area of the building, which formerly comprised actual sheet metal cutting and coating operations, is now a large warehouse for paper products, china, automobile tires, and carpets. Adjacent to the eastern side of the building is the former hazardous waste storage area. Also on this side of the building, railroad tracks oriented east-west lead from the building's southernmost corner. At the building's southwestern corner is the former pump room, where chemicals were drawn into the building through pipes connected to six underground tanks of raw material; these tanks are located immediately west of and outside the pump room. North of and adjacent to the pump room is a larger room that formerly housed end compound tanks. South of the pump room and projecting from the main building is the former drum storage room. Adjacent to and east of this room is a drum storage pad, and adjacent to and south of the drum storage room is a former drum-receiving dock. South of the drum storage pad is the former location of a waste solvent tank.[1,2,3,4,5]



SOURCE: (7.5 MINUTE SERIES) U.S.G.S. TRENTON WEST, N.J. - PA., QUAD

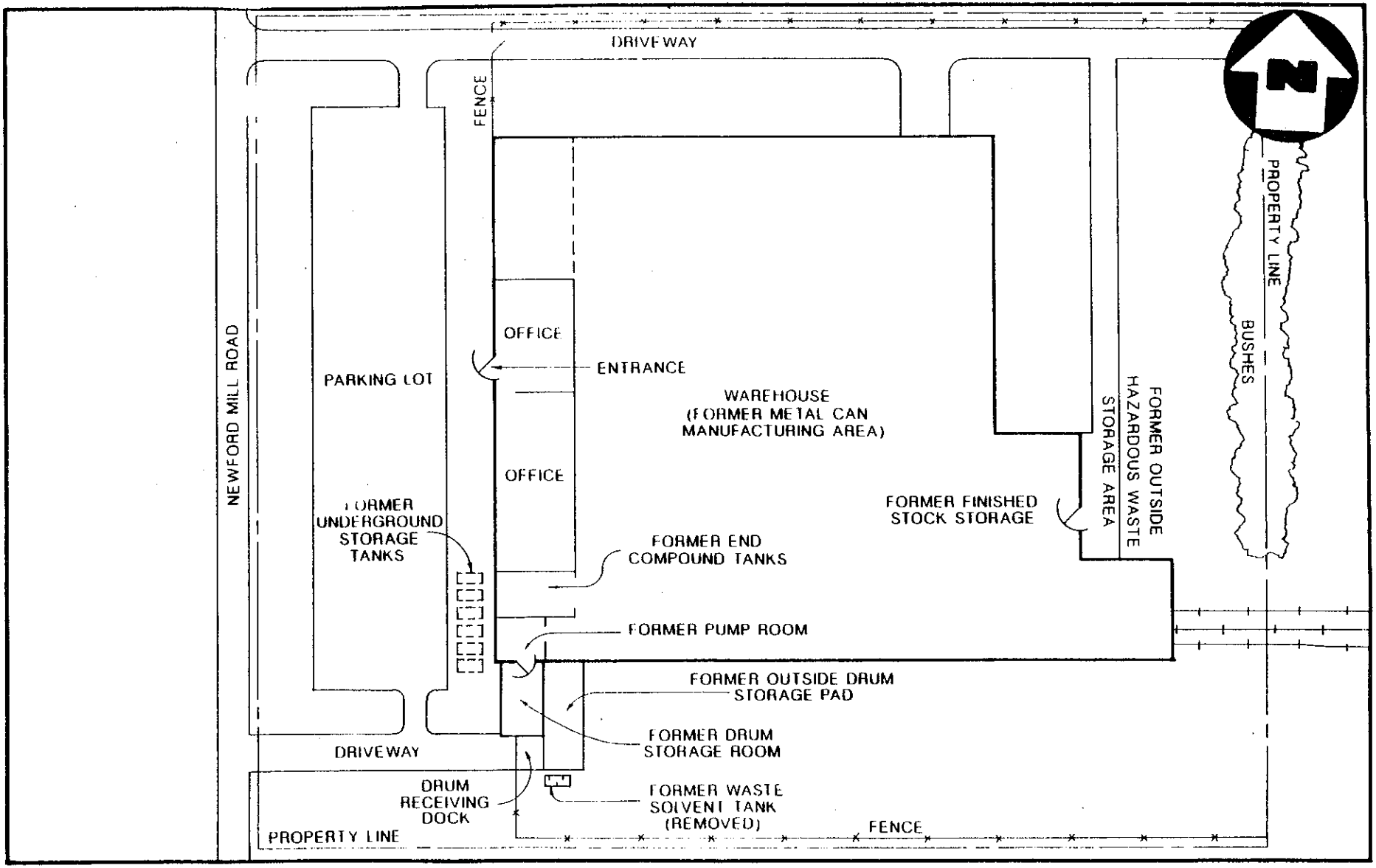
SITE LOCATION MAP

NATIONAL CAN CORPORATION

SCALE 1: 24000

FIGURE 2.1

NUS CORPORATION



SITE SKETCH

NATIONAL CAN CORPORATION

(NO SCALE)

FIGURE 2.2

NUS CORPORATION

Access to the facility is restricted to authorized personnel. A six-foot fence surrounds all but the front of the building.[2]

The site slopes gently to the east. On-site surface water runoff is expected to flow eastwardly to a grassy area east of the building and then south from the grassy area.[1,2]

2.3 Ownership History

U.S. Steel, the current owner of the subject property, has been the owner for an unknown number of years. Ownership prior to U.S. Steel is unknown. Since 1967, National Can Corporation (now known as American National Can Company) has been leasing the property from U.S. Steel under a 99-year lease. In January 1989, American National Can Company subleased the building to Eastern America, Incorporated, of Philadelphia, Pennsylvania. From 1983 until January 1989, the Raymond Rosen Company, based in Conshohocken, Pennsylvania, subleased the building.[3,4]

Robert Briggs, of Morrisville, Pennsylvania, currently subleases one room in the building. The room was originally subleased from the Raymond Rosen Company for an unknown number of years.[3,4]

2.4 Site Use History

Currently, the on-site building is being used as a warehouse. Since January 1989, Eastern America, Incorporated, a trucking company based in Philadelphia, Pennsylvania, has used the warehouse to store Lenox china, various paper products, and automobile tires. Additionally, one room in the building is used by Robert Briggs, of Morrisville, Pennsylvania. Briggs currently stores carpets in the room. It is unknown when the storage room was first used by Briggs. From 1983 until January 1989, the Raymond Rosen Company, an electronics distributor based in Conshohocken, Pennsylvania, stored televisions and stereo components in the building.[2,4]

From 1967 until 1983, National Can Corporation (now known as American National Can Company) had full use of the building, which was leased from U.S. Steel. Construction of the building occurred in 1967. Operations at the facility included the cutting, coating, and painting of sheet metal for the assembly of cans. Only the assembly of the bottoms of the cans to the sides of the cans was done at the facility. The incomplete metal cans were shipped off site for final assembly. In 1980 and 1981, operations were reduced, and, by 1983, American National Can Company had ceased all operations, moved out of the building, and subsequently subleased the building as a warehouse.[3]

2.5 Permit and Regulatory Action History

According to available information, no permits have been issued to the subject facility.[3]

On August 15, 1980, National Can Corporation filed a Notification of Hazardous Waste Activity, and on November 14, 1980, the Part A Hazardous Waste Permit Application was submitted to EPA (see appendix A for forms).[6,7,8,9] On December 22, 1980, EPA acknowledged these submittals and assigned EPA ID No. PAD046565941 to the company.[10] On July 24, 1981, EPA completed processing the Part A application and determined that National Can Corporation met the requirements for interim status. The hazardous waste codes identified for the facility were F003, F005, F001, D008, and D001. Waste code F017 was temporarily suspended from the list until further determinations of the waste could be made. The process code for the facility was identified as S01.[11]

On March 2, 1983, PA DER made a formal request to the subject facility for its Part B Permit Application.[12] On March 14, 1983, the company informed EPA that it wished to withdraw its Part A Permit Application for a storage facility and remain only a generator.[13] The company also notified PA DER of this, in April 1983.[14] In November 1983, a Notice of Violation was sent to the facility for failure to submit the Part B Permit Application within six months of the request.[15] In April 1984, National Can Corporation again notified PA DER, requesting deletion of its facility as a generator, since all manufacturing operations had ceased in September 1983.[16] On July 19, 1984, it was finally determined by PA DER that the facility was not a TSD facility. A follow-up inspection, also by PA DER, confirmed that hazardous wastes were no longer being generated or stored at the facility.[17] According to available information, no closure plan exists for the facility.[3] See appendix B for permit-related correspondence.

On May 5, 1989, NUS FIT 3 visited the National Can Corporation site to perform an EPI preliminary assessment. The visit included interviews with site representatives and a tour of the facility, including all former SWMUs.[2]

2.6 Remedial Action to Date

No remedial action has been taken at the subject site to date. No spills or releases from the facility are known or have been reported.[3]

SECTION 3

3.0 ENVIRONMENTAL SETTING

3.1 Water Supply

Residents within the three-mile radius of the site are served by seven public water supply companies. Some residents are assumed to be utilizing private domestic wells.

The Lower Bucks County Joint Municipal Authority (LBCJMA) serves 86,501 persons in Tullytown Borough and parts of Falls Township and the vicinity, including Levittown.[18] LBCJMA obtains its water from a single surface intake on the Delaware River, located 3.2 miles southwest and downstream of the site near Main Street and Fox Drive in Tullytown, Pennsylvania. Seven groundwater wells, ranging in depth from 40 to 44 feet, lie 100 feet apart in a well field located near Main Street and Fox Drive in Tullytown. These wells are only used in emergencies.[19]

The Township of Falls Authority (TFA) purchases water from LBCJMA to serve approximately 17,500 persons in Falls and Bristol Townships.[20]

The Morrisville Borough Authority (MBA) serves 14,200 persons in Morrisville Borough, Lower Makefield Township, and Falls Township.[21] MBA obtains its water from a single surface intake on the Delaware River, located outside the three-mile radius near Ferry Road and River Road in Morrisville, Pennsylvania.[22] An interconnection with the Pennsylvania - American Water Company (PAWC) currently supplements this system. PAWC serves parts of Lower Makefield and Falls Townships, and all of its water sources are far outside the three-mile radius.[23]

The Trenton Water Works (TWW) serves approximately 220,000 persons in the city of Trenton, most of Hamilton, Ewing, and Lawrence Townships, and part of Hopewell Township. TWW utilizes a surface water intake on the Delaware River, located outside the 3-mile radius of the site, approximately 100 yards north of the Calhoun Street Bridge. TWW has a 104-million-gallon potable water reservoir at Pennington and Prospect Streets in Trenton that is used to store water taken from the Delaware River. TWW also has an emergency interconnection with the Garden State Water Company and the Elizabethtown Water Company.[24]

The Bordentown Water Department (BWD) serves approximately 3,400 persons in Fieldsboro and Bordentown Township and some of Piersonville in Hamilton Township. BWD utilizes three groundwater wells, located far outside the three-mile radius, for its water supply.[25]

The Florence Water and Sewer Authority (FWSA) serves approximately 9,975 persons in Florence, New Jersey. FWSA utilizes four groundwater wells along Summer Street in Florence, located approximately 3.4 miles south-southeast of the site. These wells are 118 to 130 feet in depth and are completed in the Raritan Formation.[26]

No local residents utilizing private home wells were identified during the site visit; however, the nearest residences not supplied with municipal water are located approximately 1-1/2 miles northwest of the site.[1,2]

3.2 Surface Waters

Formerly located south of the site, in an area measuring approximately one mile by 1/4 mile, were several small ponds, marshy areas, and southward-flowing streams. However, during the site visit, it was observed that this area has been filled with stone and gravel; some of the area, located farther south, is now under construction as a landfill.[1,2]

Currently, the nearest surface water receiving drainage from the site is a three-acre pond located 3/4 mile southeast of the site. A small, unnamed perennial stream flows south-southeastwardly from this pond approximately 1/2 stream mile before discharging into the Delaware River, which flows southwestwardly past this confluence, almost two miles from the site. Surface water uses for the stream and pond are unknown. The Delaware River is used for industrial, drinking water, and recreational purposes.[1,2,19]

The facility lies within the Delaware River's 100-year flood plain. Wetlands greater than five acres in size that receive drainage from the site are not located within a three-mile radius of the facility.[1,27]

Surface water drainage is expected to flow to the east from the site to a grassy area behind (and east of) the on-site building. From this point, drainage would continue off site in a southward direction.[1,2]

The grassy area east of the building is also the location of the facility's on-site septic system. No storm drains are located on site.[2,3,4]

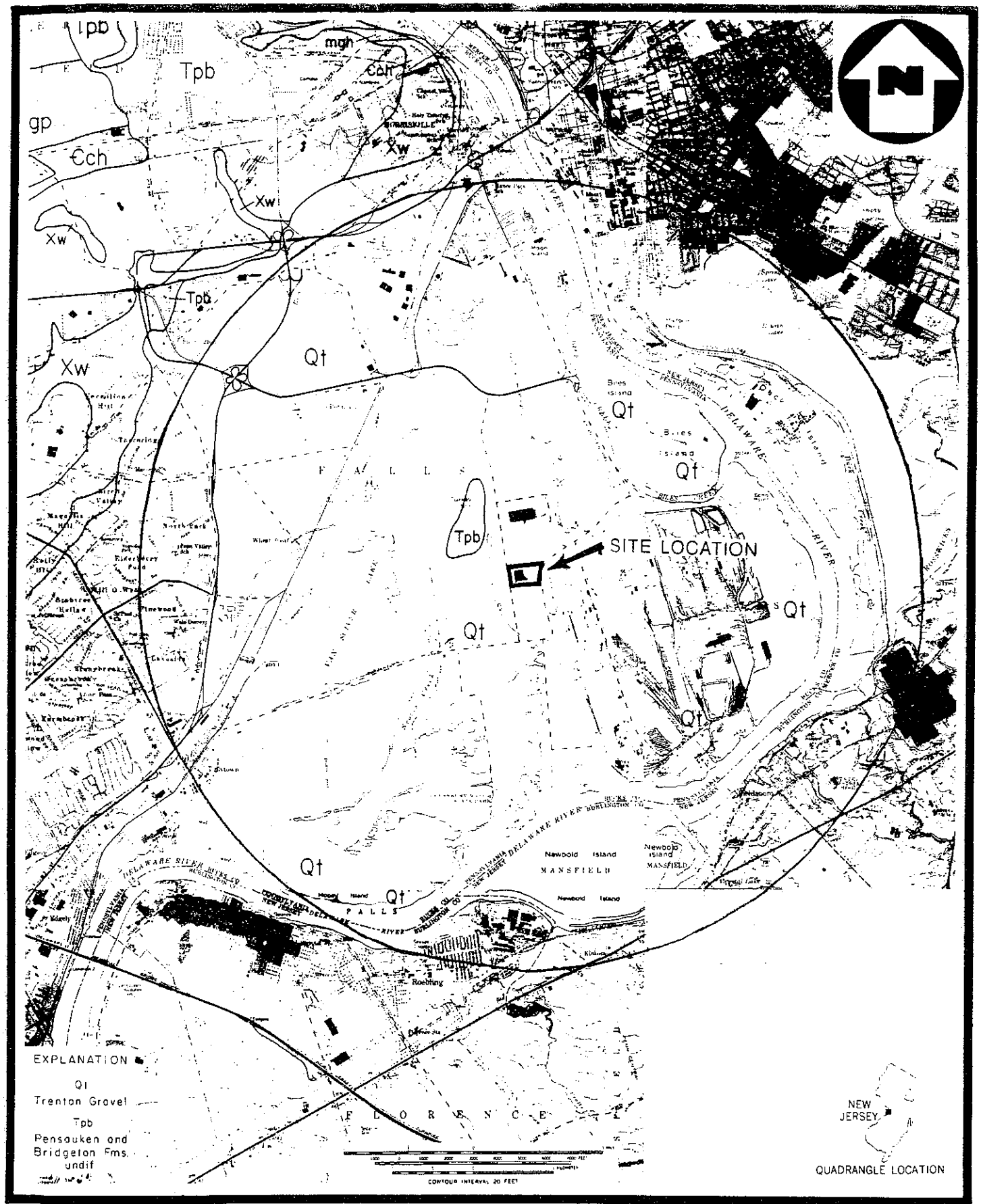
3.3 Hydrogeology

The geologic and hydrogeologic conditions in the study area were researched as part of the site investigation. A preliminary literature review was conducted to determine surface and subsurface geologic conditions, soil character, and the status of groundwater transport and storage.

3.3.1 Geology

The National Can Corporation site is located within the Atlantic Coastal Plain Province of southeastern Pennsylvania.[28] The geologic framework of the Coastal Plain consists of underlying, gently southeastward-dipping, unconsolidated marine and fluvial deposits of clay, silt, sand, and gravel of late Cretaceous and Tertiary age. Areas are also covered by interglacial fluvial deposits of Quaternary (Pleistocene) age.[29] In addition, there are exposures of Precambrian age basement rock, primarily in the stream valleys.[30] The study area has a dendritic drainage pattern.[29]

The site is underlain by the Quaternary age Trenton Gravel (see figure 3.1, page 3-4).[30] The Trenton Gravel is a gray to pale reddish-brown, medium- to coarse-grained, very gravelly sand. There are also interbedded clay-silt and crossbedded sand layers.[28,29,31] The formation occurs chiefly and is most continuous in the lowland along the Delaware River from Trenton to the Atlantic Ocean.[29] It is believed to be the equivalent of the Cape May Formation of New Jersey.[31] The youngest of the interglacial formations, the Trenton Gravel has been correlated with the Sangamon interglacial stage (approximately 300,000 years ago). The Trenton Gravel was part of an estuarine-deltaic-marine depositional environment driven and supplied by meltwater and sediment derived from retreating glaciers.[29] Its thickness is approximately 30 to 40 feet.[28,31]



SOURCE: ATLAS OF PRELIMINARY GEOLOGIC QUADRANGLE MAPS OF PENNSYLVANIA

FIGURE 3-1

GEOLOGIC MAP

NATIONAL CAN CORPORATION SITE

NUS CORPORATION

Although not exposed in the study area, the Cretaceous age Potomac Group and Raritan Formation underlie the Trenton Gravel throughout the study area. These geologic units make up the important Potomac-Raritan-Magothy aquifer, a major water supply source for residents of New Jersey. In the Delaware Valley, Raritan age sediments are indistinguishable from the underlying Potomac Group. The aquifer has been subdivided into the following units: upper clay, upper sand, middle clay, middle sand, lower clay, and lower sand.[32] This nomenclature is equivalent to earlier terminology of upper clay, Old Bridge sand member, middle clay member, Sayreville sand member, lower clay member, and Farrington sand member. Where present, the clay layers function as confining beds (aquitards). Some researchers believe that the Old Bridge sand member should be assigned to the Magothy Formation (a formation that overlies the Raritan Formation in New Jersey). This suggests that the Potomac Group and the Raritan and Magothy Formations would function as one hydrologic unit in the southern Coastal Plain of New Jersey.[33]

The upper clay of the Potomac-Raritan-Magothy aquifer is chiefly a red, white, gray, and yellow clay. It has a maximum thickness of 35 feet; however, it has a limited areal extent. The upper sand is a medium- to coarse- grained sand with minor amounts of very fine- to fine-grained sand. This sand has a thickness of 35 to 55 feet and commonly forms a single, unconfined aquifer with the overlying Trenton Gravel.[28]

The middle clay unit consists of red and white clay and is commonly about 20 feet thick. The middle sand unit is chiefly a brown, yellow, white, and gray, coarse-grained sand and gravel with a maximum thickness of 25 feet.[28]

The lower clay unit consists of brick red and gray clay that is approximately 25 to 40 feet thick. Often when the middle sand unit is absent, the lower and middle clay units merge to form a thick (47 to 60 feet) confining bed. The lower sand unit consists predominantly of coarse-grained sand and fine gravel that grade upward into medium- to fine-grained sand containing a few beds of white clay. The lower sand can range in thickness from 11 to 120 feet.[28,33]

Stratigraphically older than the Trenton Gravel and cropping out 0.4 mile northwest of the site are the Pensauken and Bridgeton Formations (undifferentiated).[30] The stratigraphically younger of the two units, the Pensauken Formation is a yellow to dark reddish-brown, extensively crossbedded, cemented sand.[31] It contains interbedded, coarse-grained gravels composed mostly of quartz, quartzite, and chert in addition to pebbles and cobbles of shale, sandstone, and crystalline rocks eroded from Mesozoic to Precambrian age formations.[29,31] The Bridgeton Formation is a yellow, white, or irregularly stained reddish to orange brown, extensively crossbedded, clayey sand. Locally, beds of gravel composed of vein quartz, chert, and quartzite are present.[31] The presence of horizontal gravel beds, crossbedding in the sands, and lenses of gravel suggest a fluvial paleoenvironment for these formations.[29] Both formations have a maximum thickness of 30 feet.[31]

3.3.2 Soils

The majority of the site is underlain by an Urban land - Howell Complex (Uh - 0 to 15 percent slopes) soil. Urban structures cover so much of this land type that identification of the soils is not practical. Most areas have been smoothed, and the original soil material has been disturbed, filled over, or otherwise destroyed by construction. The soil has a slow permeability. Soil pH was too variable to estimate.[34]

The eastern fringe of the site is underlain by Urban land soil. This soil (Ub - zero to eight percent slopes) is so densely covered by urban structures that identification of the soils is not practical. Most areas have been smoothed and the original soil material disturbed, filled over, or otherwise destroyed prior to and during construction.[34]

3.3.3 Groundwater

The Trenton Gravel, the aquifer underlying the site, has a high porosity and a high permeability.[31] In Bucks County, well depths in the Trenton Gravel range from 11 to 102 feet. Static water level ranges from 2 to 23 feet, and well yields range from 10 to 4,000 gallons per minute (gpm). The median well yield for 25 wells is 200 gpm.[28] The Trenton Gravel is hydraulically interconnected to the other sedimentary rock units in the study area because of their relatively similar lithologies and the sporadic continuity of the clay confining layers.

The sand units within the Potomac-Raritan-Magothy aquifer have a high porosity and a high permeability. The upper sand forms a hydraulically continuous unit with the Trenton Gravel and therefore functions as a single aquifer (see data on the Trenton Gravel). The middle sand has a yield range of 90 to 775 gpm and a specific capacity range of 2 to 36 gpm per feet. A total of 136 wells in the lower sand have a yield range of 30 to 1,350 gpm and an average yield of 400 gpm. The specific capacity of the lower sand ranges from 4 to 37 gpm per foot.[28]

The direction of shallow groundwater flow is expected to be to the east-northeast, toward the Delaware River, although a component of the flow could also be to the west, toward Van Sciver Lake. Flow direction is based upon topographical observations and the role of rivers as discharge points for groundwater.

3.4 Climate and Meteorology

The climate for the subject area is generally moderate, although extended periods of high temperatures and high humidity are not uncommon during the summer months. The average temperature is 54.8°F. July is the hottest month, with an average temperature of 77.9°F, and December is the coldest month, with an average temperature of 33.2°F. The average yearly precipitation is 41 inches, and the mean annual lake evaporation is 34 inches; therefore, the average net precipitation is 7 inches. A 1-year, 24-hour rainfall will produce nearly 3 inches.[35,36]

3.5 Land Use

Land use within the subject area is primarily industrial, although some residential/commercial areas exist nearly 2-1/2 miles west, south, southeast, and north-northeast of the subject facility. The city of Trenton, New Jersey is located three miles northeast of the site. Topography is relatively flat throughout the three-mile radius. The site is located in a large industrial park that comprises nearly the full one-mile radius from the site. A U.S. Steel facility abuts the former National Can Corporation's property to the east and is located up to two miles east and southeast of the subject site. A large landfill, which is currently under construction, can be located approximately 1/2 mile south-southwest of the site. Penn Central Railroad and ConRail tracks intersect the subject area to the east and west of the site. Several state and memorial parks are located two miles southwest and nearly three miles northeast and east of the site. Van Sciver Lake, approximately three miles long by one mile wide (at its widest), is located one to two miles west of the site.[1,2]

3.6 Population Distribution

An estimated 34 people reside within a 1-mile radius of the subject site. Approximately 840 people live between 1 and 2 miles from the site, and there are approximately 6,986 persons living between 2 and 3 miles from the site. Therefore, there are an estimated 7,860 people living within a 3-mile radius of the site. The most populated areas are several towns located approximately 2.5 miles west, northwest, and southeast of the site. Population figures are based on a count of homes in the subject area multiplied by 3.8 persons per home.[1]

3.7 Critical Environments

According to the United States Department of the Interior, Fish and Wildlife Service, two federally listed endangered birds are expected to be found as transient species within a three-mile radius of the subject site. These birds include the bald eagle (Haliaeetus leucocephalus) and the peregrine falcon (Falco peregrinus). No listed critical habitat exists for these species within a three-mile radius of the site.[38]

According to the Nature Conservancy, Pennsylvania Natural Diversity Inventory - Eastern Office, three species of plant life that reside within three miles of the subject site have been classified as endangered for the state of Pennsylvania. These plants are the wild ipecac (Euphorbea ipecacuanhae), the Wrights spike rush (Eleocharis obtusa v. peasi), and the long-lobed arrow-head (Sagittaria calycina v. spongiosa).[39]

SECTION 4

4.0 WASTE TYPES AND QUANTITIES

The National Can Corporation vacated the property in 1983; since then, hazardous materials have not been generated or stored at the site. Since 1983, the facility has been primarily utilized as a warehouse. From 1967 until 1983, the National Can Corporation operated at the site. In 1980, the National Can Corporation listed the following waste categories as being generated at the facility: F001 (halogenated solvents), F003 and F005 (nonhalogenated solvents), D001 (nonspecified ignitable wastes), and D008 (lead). The above waste codes were derived from the facility's Hazardous Waste Permit Application (Part A), filed in November 1980, and may not completely represent the wastes present at the site. During the NUS site visit, a representative of the National Can Corporation stated that hazardous wastes were generated at the facility during the preparation of metals for coating (degreasers, rags), the cleaning of the coating machinery (paint, vinyls, varnishes, solvents, rags), and the sealing of can ends (solvents). The following solvents were reportedly utilized at the facility: methyl ethyl ketone, methyl isobutyl ketone, hexane, mineral spirits, and toluene. The following materials were observed on the above-ground portions of the on-site underground storage tanks: beer body vinyl, beer body primer, and beer end varnish. The chemical constituents and the manufacturing of these materials are currently unknown.[3,7,9]

The hazardous wastes generated at the facility were reportedly disposed off site. From 1967 until 1979, the waste disposal practices are not readily documentable, but it was reported that an unknown amount of the wastes were disposed by William Lavelle, of Scranton, Pennsylvania. Mr. Lavelle has been prosecuted for the illegal disposal of hazardous waste at several locations in the Scranton area. From 1979 until 1983, the materials generated at the site were disposed by the licensed hazardous waste disposal firm M & M Chemical, Incorporated, of Andsden, Alabama. The materials were hauled from the site first by National Can Corporation and then by M & M, Incorporated. The materials were reportedly removed from the site every 90 days. Approximately 2 to 3 trucks loads, with eighty 55-gallon drums per load, were reportedly removed every 90 days.[3]

4.1 Solid Waste Management Units

Five SWMUs have been identified for the site. The SWMUs were identified by the site representative during the on-site inspection and from a site plan map prepared by Rollins, Burdick, and Hunter Company for the National Can Corporation in 1974. The SWMUs may be located on figure 4.1 (page 4-3) and are listed below:[3,5]

- underground storage tanks
- drum storage room
- drum storage pad
- waste solvent tank
- hazardous waste storage area

Specific information concerning the above-listed SWMUs may be found in the following sections.

4.1.1 SWMU No. 1
Underground Storage Tanks

The subject area is located outside the southwestern corner of the facility (see figure 4.1, page 4-3). The unit consists of 6 underground steel storage tanks (five 8,000-gallon and one 6,000-gallon) that were utilized to store raw materials used in the can-coating process. All of the tanks have above-ground tanker truck couplings and discharge outlets within the facility's pump room. The raw liquid materials, including solvents, primers, and varnishes, were stored in the can and discharged into drums as needed. The tanks have not been utilized since 1983, and it is not known if any material remains in the tanks.[3,5]

Date of Start-Up

The tanks were installed and first utilized in 1967, when the facility became operational.[3]

Date of Closure

The tanks were reportedly utilized continuously until National Can Corporation vacated the property in 1983. It is not known if any material remains in the tanks.[3]

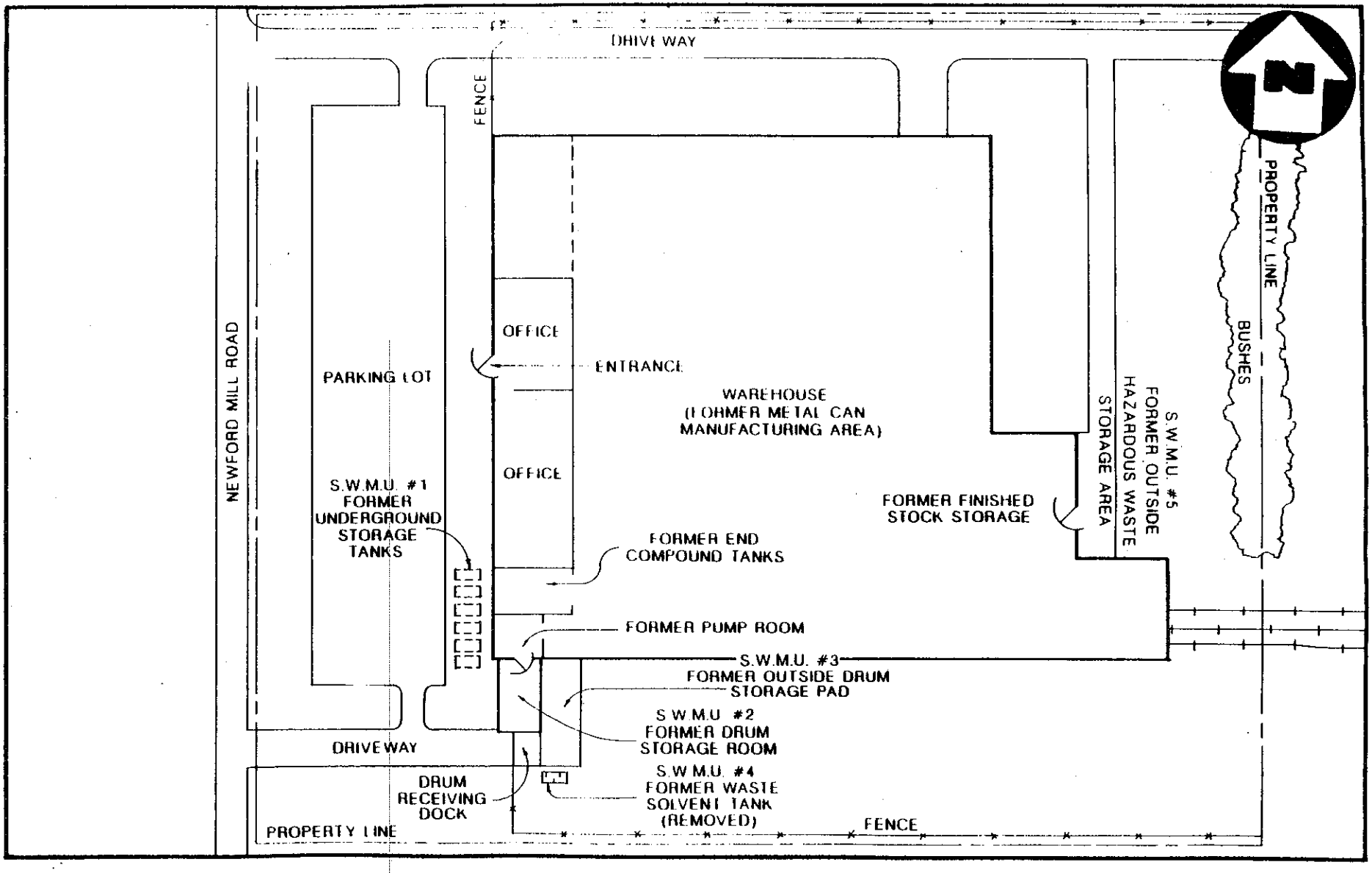


FIGURE 4.1

SOLID WASTE MANAGEMENT UNIT LOCATION MAP

NATIONAL CAN CORPORATION

(NO SCALE)

NUS CORPORATION

Wastes Managed

Waste materials were never stored in the tanks. The tanks were utilized to store mineral spirits, varnishes, vinyls, and primers. The chemical constituents of the coating materials are unknown.[3]

Release Controls

The primary containment of the materials consists of five 8,000-gallon and one 6,000-gallon underground steel tanks.[3]

There are no known secondary containment features associated with the tanks. The above-ground features of the tank are located in an unrestricted portion of the site and exist in an unlined gravelly area adjacent to the facility parking lot.[2,3]

History of Releases

There are no known or reported releases of hazardous materials from the subject area. Visual evidence of spillage was observed on the gravel parking lot in the vicinity of the above-ground couplings. No HNU readings above background were recorded in the subject area.[2,3]

4.1.2 SWMU No. 2
Drum Storage Room

The drum storage room is located within a 25- by 10-foot room that extends from the southwestern corner of the facility (see figure 4.1, page 4-3). The room is constructed of cinderblocks and has a cement floor with heavy metal doors on the northern and southern sides. The room was believed to have been utilized for the storage of 55-gallon drums of raw material. Access to the room was not gained during the inspection, but the site representative stated that the room is currently subleased to a carpet contractor for storage.[2,3,5]

Date of Start-Up

The site representative has no record detailing the use of this area. It is believed that the room was first utilized for drum storage when the facility became operational in 1967.[3]

Date of Closure

It is believed that the room was utilized for drum storage until the National Can Corporation vacated the site in 1983.[3]

Wastes Managed

There is no record detailing the materials stored in the area. It is believed that only raw materials were stored in the area. The materials that may have been stored in the room are methyl ethyl ketone, toluene, methyl isobutyl ketone, hexane, and mineral spirits.[3]

Release Controls

The primary storage of the materials within the room is unknown but most likely consisted of steel 55-gallon drums.

The secondary containment features of the unit are unknown and could not be evaluated in the field.

History of Releases

There have been no known or reported releases of hazardous materials from the subject area. The subject area could not be visually inspected during the site visit, and HNU readings were not obtained from the area.[2]

4.1.3 SWMU No. 3
Drum Storage Pad

The drum storage pad is located adjacent to the eastern side of the drum storage room at the southwestern corner of the facility (see figure 4.1, page 4-3). The unit consists of an open-air, 25- by 10-foot concrete platform. The unit is bordered by the building on two sides and by unpaved grassy areas on the remaining sides. According to photographs taken in November 1980, the platform and the grassy area east of the platform were used for the storage of 55-gallon steel drums (see appendix C for photographs). The site representative has no record of the area's utilization as a drum storage area.[2,3,5,37]

Date of Start-Up

It is believed that the area was first utilized for drum storage when the facility opened in 1967.[3]

Date of Closure

It is believed that the area was continually utilized for drum storage until the facility closed in 1983.[3]

Wastes Managed

There is no record detailing the materials stored in the area. It is not known if raw materials, waste materials, or empty drums were stored in the area.[3]

Release Controls

If raw or waste liquid materials were stored in the area, the primary containment of the materials would have consisted of 55-gallon steel drums. The drums were stored on steel racks and directly on the concrete pad. The unbermed concrete pad is bounded on the west and north by the facility walls and on the east and south by unpaved grassy areas. All surface drainage from the pad will flow toward the grassy areas.[2]

History of Releases

There are no known or reported releases of hazardous materials from the subject area. Visual evidence of spillage (oil-stained soil) was observed along the edge of the concrete pad. No HNU readings above background were recorded in the subject area.[2]

4.1.4 SWMU No. 4
Waste Solvent Tank

The waste solvent tank is believed to have been located directly south of the drum storage pad (see figure 4.1, page 4-3). The tank was not present during the NUS site visit, and the site representative had no information concerning the tank or its usage.[3,5]

Date of Start-Up

It is believed that the tank was installed and first utilized in 1967, when the facility began operations.[3]

Date of Closure

It is believed that the tank was continually utilized until 1983, when National Can Corporation vacated the property.[3]

Wastes Managed

The materials stored in the tank are unknown but, based on its name, it can be assumed that waste solvents were deposited into the tank. The solvents known to have been utilized at the facility include methyl ethyl ketone, toluene, methyl isobutyl ketone, hexane, and mineral spirits. Based on the known solvents utilized at the facility, the following waste categories were potentially stored in the tank: F001, F003, and F005.[2,3,5]

Release Controls

The primary containment of the waste solvents consisted of the tank. The specifics of the tank (size, construction, etc.) are unknown. The secondary containment of the materials is unknown, but the area where the tank is believed to have been located is an unpaved grassy area with no observable diversionary or containment features.[2,5]

History of Releases

There are no known or reported releases of hazardous materials from the subject area. No HNU readings above background were recorded in the subject area.[2]

4.1.5 SWMU No. 5

Hazardous Waste Storage Area

The hazardous waste storage area is located outside the eastern side of the facility and adjacent to the northern wall of the railroad car loading docks (see figure 4.1, page 4-3). The unit consists of a paved, open area that was designed for the storage of hazardous materials that were generated in the facility. The materials were reportedly stored in 55-gallon drums and on wooden pallets and were routinely removed from the site for disposal.[2,3,5]

Date of Start-Up

The subject area was reportedly first utilized in 1967 when the facility became operational.[3]

Date of Closure

The subject area was reportedly utilized for hazardous storage until the National Can Corporation vacated the site in 1983.[3]

Wastes Managed

All of the hazardous wastes that were generated at the facility were reportedly stored in the subject area. Based on the materials known to have been utilized at the facility, the following wastes are believed to have been present in the subject area: methyl ethyl ketone, toluene, methyl isobutyl ketone, hexane, mineral spirits, unknown vinyls, primers, and varnishes, solvent rags, waste oils, and other miscellaneous materials. Based on RCRA permit application, the following waste categories were generated by the facility and are believed to have been stored in the area: F001, F003, F005, D001, and D008.[3,7,8]

Release Controls

The primary containment of the materials stored in the area consisted of 55-gallon drums.[3]

History of Releases

There are no known releases of hazardous materials from the subject site. No HNU readings above background were recorded in the subject area.[2,3]

SECTION 5

5.0 FIELD TRIP REPORT

5.1 Summary

On Friday, May 5, 1989, NUS FIT 3 members Donna McKeever and Carl Rodzewich conducted an EPI preliminary assessment of National Can Corporation. The FIT was accompanied by Judith Peters, senior environmental specialist for American National Can Company, and Herb Massaro, of Eastern America, Incorporated. Weather conditions at the time of the site visit were rainy and overcast, with temperatures in the mid-50s. Photographs were obtained at the site by FIT 3 members (see figure 5.1, page 5-4, and the photograph log, section 5.4).

5.2 Persons Contacted

5.2.1 Prior to Field Trip

Joseph Kotlinsky
U.S. EPA
841 Chestnut Building
Ninth and Chestnut Streets
Philadelphia, PA 19107
(215) 597-8392

Judith Peters
Senior Environmental Specialist
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504
(312) 399-3162

Herb Massaro
Eastern America, Incorporated
8501 Hegerman Street
Philadelphia, PA 19136
(215) 333-4444

R.M. Rivetna
Manager, Environmental Engineering
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504
(312) 399-3392

Sharon O'Keef
Dickinson, Wright, Moon,
Van Dusen and Freeman
800 First National Building
Detroit, MI 48226
(313) 223-3614

James Harper
William Walsh
U.S. EPA
841 Chestnut Building
Ninth and Chestnut Streets
Philadelphia, PA 19107
(215) 597-0823
(215) 597-1192

5.2.2 At the Site

Judith Peters
Senior Environmental Specialist
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504
(312) 399-3162

Herb Massaro
Eastern America, Incorporated
8501 Hegerman Street
Philadelphia, PA 19136
(215) 333-4444

5.2.3 Water Supply Well Information

During the EPI preliminary assessment, no home wells in the subject area were located. However, the nearest residences not supplied with municipal water are located approximately 1-1/2 miles northwest of the site.

5.3 Site Observations

- The HNU was set on the 0-to-20 setting; no readings above background were recorded.
- The mini-alert was set at the X1 position; no readings above background were recorded.
- The site is approximately 16-1/2 acres in size.
- Five SWMUs are associated with the site: underground storage tanks, the drum storage room, the drum storage pad, the waste solvent tank, and the hazardous waste storage area.
- Surface water runoff is expected to flow to the east from the site, onto a grassy area, and then southwardly.
- Access to the property and the on-site building was unrestricted; one room that is used to store carpets was locked.
- The National Can Company facility is no longer used for its original purposes. The on-site building was used solely as a warehouse at the time of the FIT visit.
- The underground raw storage tanks associated with National Can Corporation were intact; it could not be determined whether they contained chemicals.

APPENDIX A

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NUMBER

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

Notification package with ID number not required we are requesting an EPA I.D. number.

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

FOR OFFICIAL USE ONLY

COMMENTS

C

RCRA SECTION
EPA REGION III

INSTALLATION'S EPA I.D. NUMBER	T/A	C	APPROVED	DATE RECEIVED (yr., mo., & day)
F PAD046565941	3	1		800818

AUG 18 80 000195

I. NAME OF INSTALLATION

NATIONAL CAN CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX		
3 NEWFORD MILL ROAD		
CITY OR TOWN	**ST.**	**ZIP CODE**
4 MORRISVILLE	PA	19067

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER		
5 NEWFORD MILL ROAD		
CITY OR TOWN	**ST.**	**ZIP CODE**
6 MORRISVILLE	PA	19067

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 DETTORRE PAT PLANT MANAGER	215 295-8121

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 NATIONAL CAN CORPORATION

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON–FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [X] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only — enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

Please print or type in the unshaded areas only (fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F PAD046565941

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X

III. NAME OF FACILITY

1 SKIP: NATIONAL CAN CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 DETTORRE PATRICK PLANT MGR	215 295 8121

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 NEWFORD MILL ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 MORRISVILLE	PA	19067

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 NEWFORD MILL ROAD

B. COUNTY NAME: LOWER BUCKS

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 MORRISVILLE	PA	19067	NA

CONTINUE ON RE

Please print or type in the shaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F PAD046565941

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
87	02	20

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP I

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	15,600	G		7				
2					8				
3					9				
4					10				

Continued from page 2.

NOTE: Photocopy this page before completing if ...ave more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)			FOR OFFICIAL USE ONLY		
WPAD046565941	T/A	C	W	T/A	C
		1	DUP	2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F019	414	T	S01	SUSPENDED 1/16/81 F.R.
2	F003				included with above
3	F005				included with above
4	F001	25	T	S01	
5	D008	130	T	S01	
6	D001	130	T	S01	
7					
8					
9					
10					
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24					
25					
26					

APPENDIX B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUL 24 1981

Mr. N. Chernikoff
National Can Corporation
Newford Mill Road
Morrisville, PA 19067

Dear Mr. Chernikoff:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

Judy to complete the form

Date of inspection 5/3/84 Time start _____ Time finish 6.11.84

Name of inspector GARY BONNER

Company, installation name NATIONAL CAN CORPORATION

Location NEW FORD MILL RD

County BUCKS Municipality FALLS TWP

Identification number PAD 046565941

Name of responsible official R. M. RIVETNA

Title MANAGER ENVIRONMENTAL ENGINEERING

Mailing address 8101 HIGGINS RD, CHICAGO, ILLINOIS 60631

Area code and phone no. (312) 399-3392

Name of person interviewed _____

Title _____

Mailing address (if different from above) _____

Area code and phone no. _____

1. Current waste handling method: N/A

   a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal

   b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

   c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal

   d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

   a. _____ kg./mo.

   b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

   NONE

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☐ No

NATIONAL CAN CORP.
JUN 11 1984
ENVIRONMENTAL ENGINEERING

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of Inspection 5/3/84 Identification Number PAD 046565941

Company, Installation Name NATIONAL CAN CORPORATION

County BUCKS Municipality FALLS TWP

AN INSPECTION CONFIRMED THAT HAZARDOUS WASTES ARE NO LONGER GENERATED OR STORED AT THE FACILITY. SECTION 75.267(b)(7) REQUIRES THAT A REVISED NOTIFICATION FORM BE SUBMITTED WHEN HAZARDOUS WASTE IS NO LONGER GENERATED. THE FORM WAS PREVIOUSLY PROVIDED TO YOU. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT ME.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____

Inspector (signature) Gary Bonner Date 6/4/84

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Shirley D. Bulkin
Chief, Administrative Support Section
Permit Enforcement Branch

Enclosure

INTERIM STATUS

Date Prepared: July 24, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: National Can Corporation

Location: Newford Mill Road
Morrisville, PA 19067

EPA I.D. No.: PAD 04 656 5941

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. N. Chernikoff

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S01	15,600 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

F003	F005	F001	D008	D001

* For Waste Code F017, See Attachments

ATTACHMENT

Re: Paint Wastes

EPA has completed its initial review of your application to treat/store/dispose of hazardous waste under the Resource Conservation and Recovery Act (RCRA). The paint wastes listed as being handled by your facility have been temporarily suspended from regulation as a listed hazardous waste. An amendment to 40 CFR Part 261.32, Hazardous Waste from Specific Sources, was published in the Federal Register on January 16, 1981. This amendment temporarily suspended the listing of all wastes from the manufacture of paints (EPA Hazardous Wastes Nos. F017, F018, K078, K079, K081, K082) until further study on those wastes has been conducted. However, wastes which exhibit any of the hazardous waste characteristics (i.e. reactivity, ignitability, corrosivity, and EP toxicity) as defined in 40 CFR Part 261 remain subject to regulation under RCRA.

EPA requests that you make a determination as to whether or not the waste streams listed on your application are hazardous by one or more of the general characteristics. Ignitability and EP toxicity would be the characteristics which would most likely cause paint manufacturing wastes and residues to be defined as a hazardous waste. In order to properly process your permit application and avoid further inquiries, a response within 10 days would be beneficial to yourself and EPA.

If you have any questions, please do not hesitate to contact Bill Walsh at (215) 597-1230.

All replies should be addressed to:

U.S. Environmental Protection Agency
Permits Enforcement Branch
RCRA Administrative Support Section
6th and Walnut Streets
Philadelphia, PA 19106
Attn: Ms. Shirley D. Bulkin (3EN24)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2420

March 2, 1983

Mr. Patrick Dettorre, Plant Manager
National Can Corporation
New Ford Mill Road
Morrisville, PA 19067

Re: EPA Identification No. PAD 046565941
Facility Name: National Can Corporation
New Ford Mill Road
Falls Township, PA 19067

Dear Mr. Dettorre:

This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referred above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than September 1, 1983. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

If your facility is not a TSD (treatment, storage or disposal site), or if you stopped functioning as a TSD facility after November 19, 1980, or if you qualify under the Permit by Rule provision of the regulations, it will be necessary for you to contact one of our field offices, and to arrange for an inspection to confirm this. Our field offices and the areas covered are the Bethlehem Office, phone number 861-2070, covering Berks, Lehigh and Northampton Counties; and the Norristown Office, phone number 631-2420, covering Philadelphia, Bucks, Chester, Delaware and Montgomery Counties.

If you functioned as a TSD after November 19, 1980, it will be necessary for you to submit four copies of a closure plan to Mr. Bruce Beitler of this office.

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B application will be reviewed for a hazardous waste management TSD Permit by both the U. S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact Mr. Lawrence H. Lunsk, Solid Waste Facilities Supervisor, at the letterhead address, or by calling 215 631-2420.

Very truly yours,

WAYNE L. LYNN
Regional Solid Waste Manager

Re P770

ENCLOSURE

(3)

Fairless

National Can

April 27, 1983

Pennsylvania Department of
Environmental Resources
Bureau of Solid Waste
Management
P. O. Box 2063
Harrisburg, PA 17120
Attn: Ms. Gayle Leader

RE: NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
REQUEST FOR A CHANGE IN STATUS
DELETION OF STORAGE ACTIVITY
NATIONAL CAN CORPORATION
FAIRLESS HILLS FACILITY
U.S. EPA IDENTIFICATION NUMBER PAD046565941

Dear Ms. Leader:

Attached please find the completed Notification of Hazardous Waste Activity Form which you sent us April 15, 1983. This form indicates deletion of our facility as a storage facility but retains our generator status. We are hereby requesting deletion of the storage activity for our Fairless Hills facility.

As stated in our March 14, 1983 letter to Ms. Shirley Bulkin of US EPA Region III, copy attached, our Fairless Hills facility has never stored hazardous waste longer than the 90 day limitation and we do not anticipate storage over the 90 day limit in the future. We, therefore, have determined that a hazardous waste permit for this facility is no longer required.

At the present time this facility is a small quantity generator. We do, however, wish to retain our US EPA Identification Number should we have hazardous waste to ship off-site in the future.

We trust the supplied information is sufficient to delete the storage activity for this facility and retain our generator status.

Pennsylvania Department of
Environmental Resources
Attn: Ms. Gayle Leader

If you have any questions or require additional information do not hesitate to contact the undersigned at (312) 399-3392.

Yours very truly,

NATIONAL CAN CORPORATION

R. M. Rivetna
Manager
Environmental Engineering

RR/gs
attachment

cc: Mr. Larry Lunsk
Commonwealth of Pennsylvania
Dept. of Environmental Resources
1875 New Hope Street
Norristown, PA 19401

bcc: J. Peters - EXEC
J. Sampson - ENGR
G. Cohen - FAIR

National Can

CERTIFIED

March 14, 1983

Ms. Shirley D. Bulkin
Environmental Protection
Specialist
RCRA Permit & Pesticides
Section
Waste Management Branch
U.S. EPA Region III
6th and Walnut Streets
Philadelphia, PA 19106

RE: WITHDRAWAL OF HAZARDOUS WASTE
PERMIT PART A APPLICATION
NATIONAL CAN CORPORATION
FAIRLESS HILLS FACILITY
U.S. EPA IDENTIFICATION NUMBER PAD046565941

Dear Ms. Bulkin:

On November 14, 1980, National Can Corporation submitted a Hazardous Waste Permit Part A Application for the above plant to be a storage facility. This Permit Part A Application for a storage facility was submitted so that this plant could store hazardous waste in the event that the hazardous waste could not be moved off-site within the 90 day limitation. Since this Hazardous Waste Permit Part A was submitted, we have not stored any hazardous waste over the 90 day limitation at this plant and we do not anticipate storage over the 90 day limit in the future.

We have, therefore, determined that a hazardous waste permit for this plant as a storage facility is no longer required and we wish to withdraw our Hazardous Waste Permit Part A Application as a storage facility for this plant. We do, however, wish to retain our generator status and all hazardous waste will continue to be moved off-site within the 90 day limitation.

We trust this information is sufficient to withdraw our Hazardous Waste Permit Part A.

If you have any questions or require additional information do not hesitate to contact the undersigned at (312) 399-3392.

Yours very truly,

NATIONAL CAN CORPORATION

R. M. Rivetna
Manager
Environmental Engineering

RR/gs

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

N. Chernikoff

cc: Mr. Gary R. Galida
Chief, Division of
Hazardous Waste Management
Bureau of Solid Waste
Management
Commonwealth of Pennsylvania
Department of Environmental
Resources
P. O. Box 2063
Harrisburg, PA 17120

Pennsylvania Department of Environmental Resources

BUREAU OF SOLID WASTE MANAGEMENT

ER-SWM-53: Rev. 3/82

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I INSTALLATION'S EPA I.D. NUMBER

PADO46565941

II NAME OF INSTALLATION

National Can Corporation

III INSTALLATION MAILING ADDRESS

STREET OR P. O. BOX

Newford Mill Road

CITY OR TOWN	ST.	ZIP CODE
Morrisville	PA	19067

IV LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER	MUNICIPALITY
SAME	Falls

CITY OR TOWN	ST.	ZIP CODE	COUNTY
			Lower Bucks

V. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
Cohen, George Plant Manager	215 295 8121

VI. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

NATIONAL CAN CORPORATION

B. TYPE OF OWNERSHIP

(enter the appropriate letter into box)

F = FEDERAL M = NON-FEDERAL [M]

VII SIC CODES (4-digit in order of priority)

A. FIRST	C. THIRD
3411 (specify) Metal Cans	(specify)
B. SECOND	**D. FOURTH**
(specify)	(specify)

VIII. TYPE OF HAZARDOUS WASTE ACTIVITY

- [ ] A. GENERATION
- [X] C. STORE
- [ ] E. TRANSPORTATION (COMPLETE ITEM IX)
- [ ] G. REUSE, RECYCLE, RECLAIM
- [ ] B. TREAT
- [ ] D. DISPOSE
- [ ] F. PERMIT BY RULE
- [ ] H. OTHER (specify)

IX MODE OF TRANSPORTATION (transporters only)

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify)

X EXISTING ENVIRONMENTAL PROGRAM PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)	
B. UIC (Underground Injection of Fluids)	E. SOLID WASTE	
C. RCRA (Hazardous Wastes)	F. OTHER	(specify)

XI. TYPE OF NOTIFICATION

Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).

- [ ] A. FIRST NOTIFICATION
- [ ] B. CHANGE OF GENERAL INFORMATION
- [ ] C. DELETION OF A WASTE
- [ ] D. ADDITION OF A WASTE
- [X] E. DELETION OF AN ACTIVITY
- [ ] F. ADDITION OF AN ACTIVITY

CONTINUE ON REVERSE

XII DESCRIPTION OF HAZARDOUS WASTES *(Continued from front)*

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F063	F005				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (*See* §75.261(g)(2) through (5))

☒ 1. IGNITABLE ☐ 2. CORROSIVE ☐ 3. REACTIVE ☒ 4. EP TOXIC

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME and OFFICIAL TITLE (Type or Print)	DATE SIGNED
R. Rivetna	R. M. Rivetna Manager-Environmental Engr.	

FOR OFFICIAL USE ONLY

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 631-2420

November 17, 1983

Mr. Patrick Dettorre, Plant Manager
National Can Corporation
New Ford Mill Road
Morrisville, PA 19067

NOTICE OF VIOLATION

Re: Application No. PAD046565941

Dear Mr. Dettorre:

In a letter dated March 3, 1983, the Department of Environmental Resources made a formal request for your Part B application for a hazardous waste management facility permit. This application was required to be submitted to the Department no later than September 1, 1983, which was six months after the date of the request. Since you have not submitted the Part B application within the required time, you are in violation of the Department's hazardous waste facility regulations as set forth in 25 Pa. Code Section 75.265(z)(6).

Within 14 days please submit to the Department your Part B application for your hazardous waste management facility permit or explain your reasons for believing that your facility is not subject to the requirements of Section 75.265(z)(6). If you are no longer functioning as a hazardous waste treatment storage or disposal facility you will have to submit a revised notification form indicating your change in status. Upon receipt of this information confirmation will be made by our staff. Contact Mr. James Dolan at 631-2420 to obtain these forms.

Very truly yours,

LAWRENCE H. LUNSK
Solid Waste Facilities Supervisor

cc: Field Supervisor
Re 30 LP37

MAR 1 1984

(7)

National Can

April 11, 1984

Mr. Gary Bonner
Pennsylvania Department of
Environmental Resources
Bureau of Solid Waste Management
PO Box 2063
Harrisburg, PA 17120

Dear Mr. Bonner:

RE: Notification of Deletion of Generator Status
National Can Corporation - Fairless Facility
USEPA ID No. PAD046565941

Enclosed is the Notification of Hazardous Waste Activity form which indicates our request to delete the generator status of this facility.

National Can Corporation discontinued manufacturing operations at the Fairless facility in September, 1983. At the present time, we do not anticipate resuming operations at this facility and therefore request deletion of our status as a generator of hazardous waste.

We trust the supplied information is sufficient to delete this facility as a generator of hazardous waste.

If you have any questions or require additional information, do not hesitate to contact the undersigned at (312)399-3392.

Very truly yours,

NATIONAL CAN CORPORATION

R. M. Rivetna
Manager
Environmental Engineering

RMR/et

enclosures

bcc: J. Peters - EXEC
J. Sampson - "
8789C

Pennsylvania Department of Environmental Resources

BUREAU OF SOLID WASTE MANAGEMENT

WM-53: Rev. 3-82

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I. INSTALLATION'S EPA I.D. NUMBER

PAD 046562941

II. NAME OF INSTALLATION

NATIONAL CAN CORPORATION

III. INSTALLATION MAILING ADDRESS

STREET OR P. O. BOX

8101 West Higgins Road

CITY OR TOWN | ST. | ZIP CODE

Chicago | IL | 60631

IV. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER | MUNICIPALITY

NEWFORD MILL ROAD | FALLS

CITY OR TOWN | ST. | ZIP CODE | COUNTY

MORRISVILLE | PA | 19067 | LOWER BUCKS

V. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title) | PHONE NO. (area code & no.)

RIVETNA, ROHINTON - Mgr. ENV. ENGR | 3 1 2 3 9 9 2 3 9 2

VI. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

NATIONAL CAN CORPORATION

B. TYPE OF OWNERSHIP

(enter the appropriate letter into box)

F = FEDERAL N = NON-FEDERAL | M

VII. SIC CODES (4-digit, in order of priority)

A. FIRST: 3411 (code) MANUFACTURE OF METAL CONTAINERS (specify)

B. SECOND: (code) (specify)

C. THIRD: (code) (specify)

D. FOURTH: (code) (specify)

VIII. TYPE OF HAZARDOUS WASTE ACTIVITY

- [X] A. GENERATION
- [ ] B. TREAT
- [ ] C. STORE
- [ ] D. DISPOSE
- [ ] E. TRANSPORTATION (COMPLETE ITEM IX)
- [ ] F. PERMIT BY RULE
- [ ] G. RECUP, RECYCLE, RECLAIM
- [ ] H. OTHER (specify):

IX. MODE OF TRANSPORTATION (transporter only)

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

X. EXISTING ENVIRONMENTAL PROGRAM PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
B. UIC (Underground Injection of Fluids)	E. SOLID WASTE
C. RCRA (Hazardous Waste)	F. OTHER (specify)

XI. TYPE OF NOTIFICATION

Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).

- [ ] A. FIRST NOTIFICATION
- [ ] B. CHANGE OF GENERAL INFORMATION
- [ ] C. DELETION OF A WASTE
- [ ] D. ADDITION OF A WASTE
- [X] E. DELETION OF AN ACTIVITY
- [ ] F. ADDITION OF AN ACTIVITY

XII. DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003	F005				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR 261.21 through 261.24)

- [X] 1. IGNITABLE
- [ ] 2. CORROSIVE
- [ ] 3. REACTIVE
- [X] 4. EP TOXIC

XIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME and OFFICIAL TITLE (Type or Print)	DATE SIGNED
R. Rivetna	R.M. Rivetna Manager-Environmental Engr.	4-12-84

FOR OFFICIAL USE ONLY

(5)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 270-1920

July 19, 1984

Mr. R. M. Rivetna, Manager
Environmental Engineering
National Can Corporation
8101 West Higgins Road
Chicago, IL 60631

Re: Fairless Facility
Identification No. PAD046565941

Dear Mr. Rivetna:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our hazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NPDES or local sewer authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at the above number.

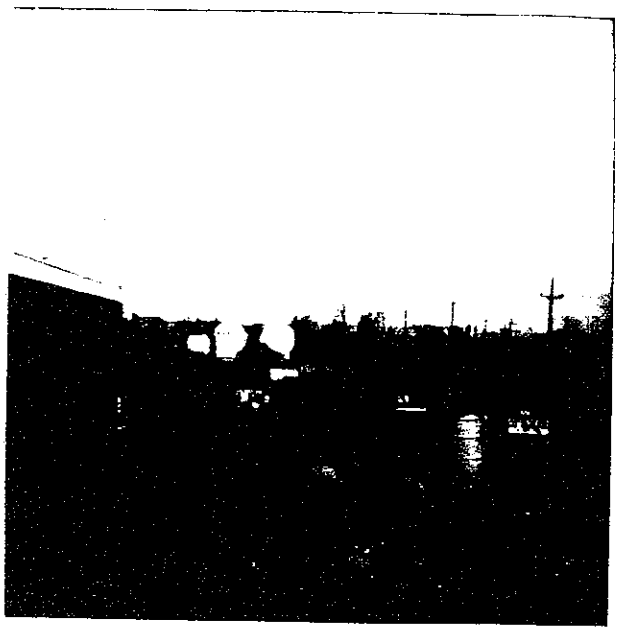
Very truly yours,

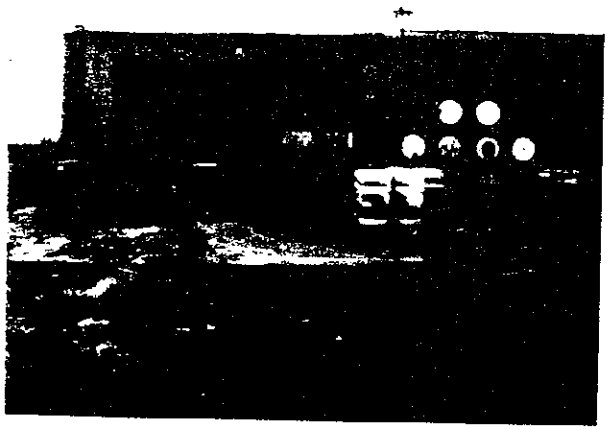
LAWRENCE H. LUNSK
Solid Waste Facilities Supervisor

cc: Falls Township
Bucks County Health Department
Division of Hazardous Waste Management
U.S. EPA Code 3AW32
Re 30 4W 201

APPENDIX C

National Can Corporation
Fairless
Drum Storage Area
November, '80





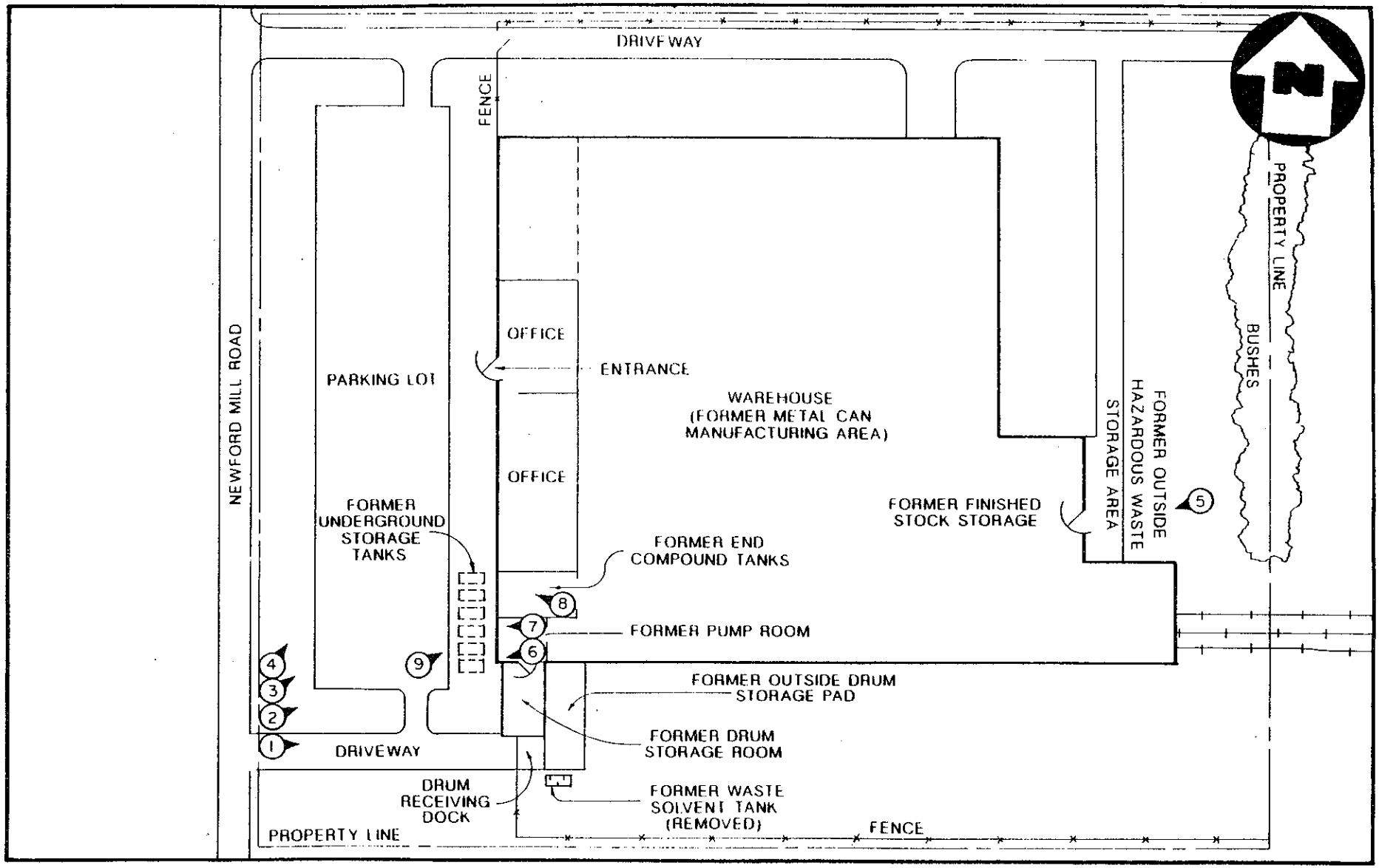


PHOTO LOCATION MAP

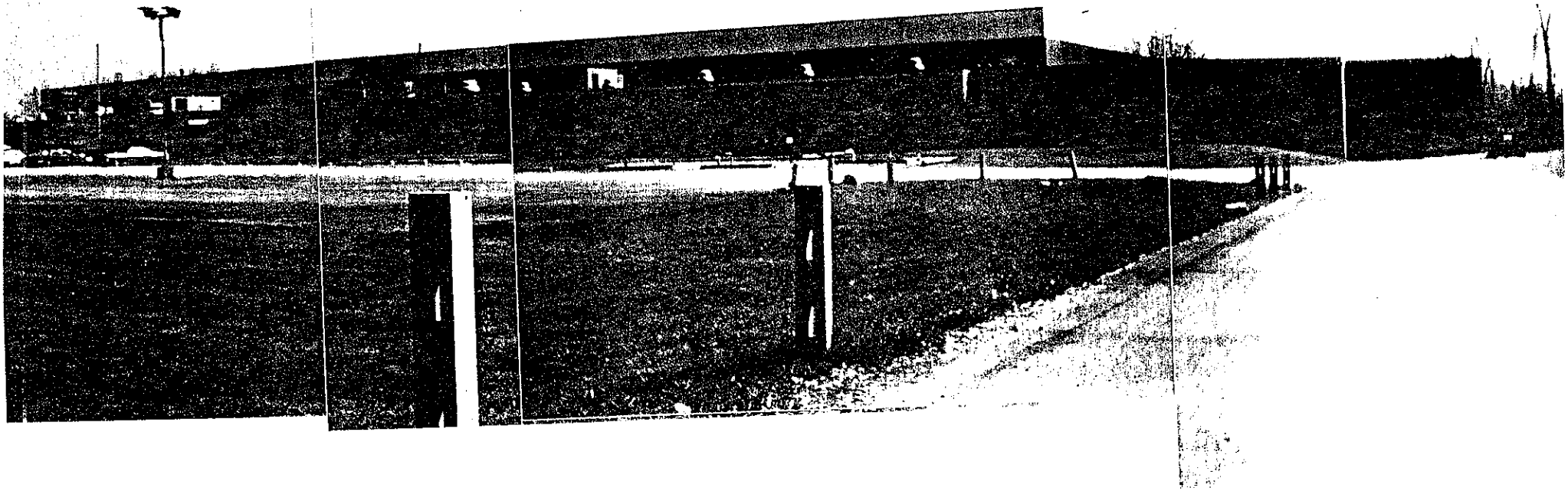
NATIONAL CAN CORPORATION

(NO SCALE)

FIGURE 5.2

NUS CORPORATION

PHOTOGRAPHIC
LOG



Photos #1, #2, #3, #4
Pan of former facility facing
northeast

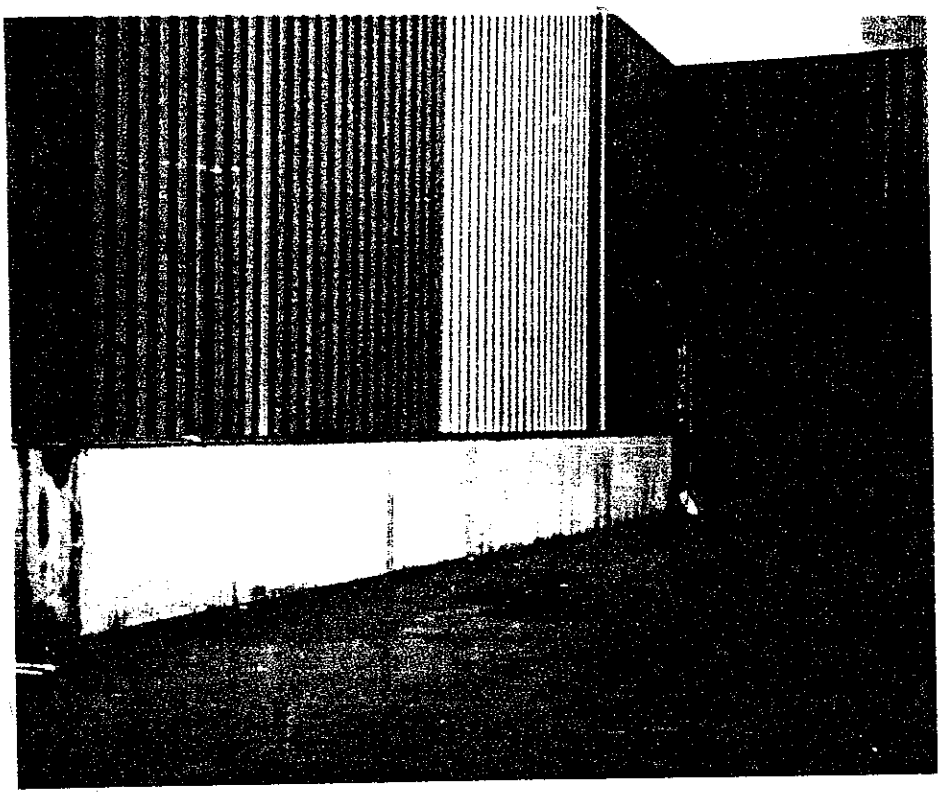
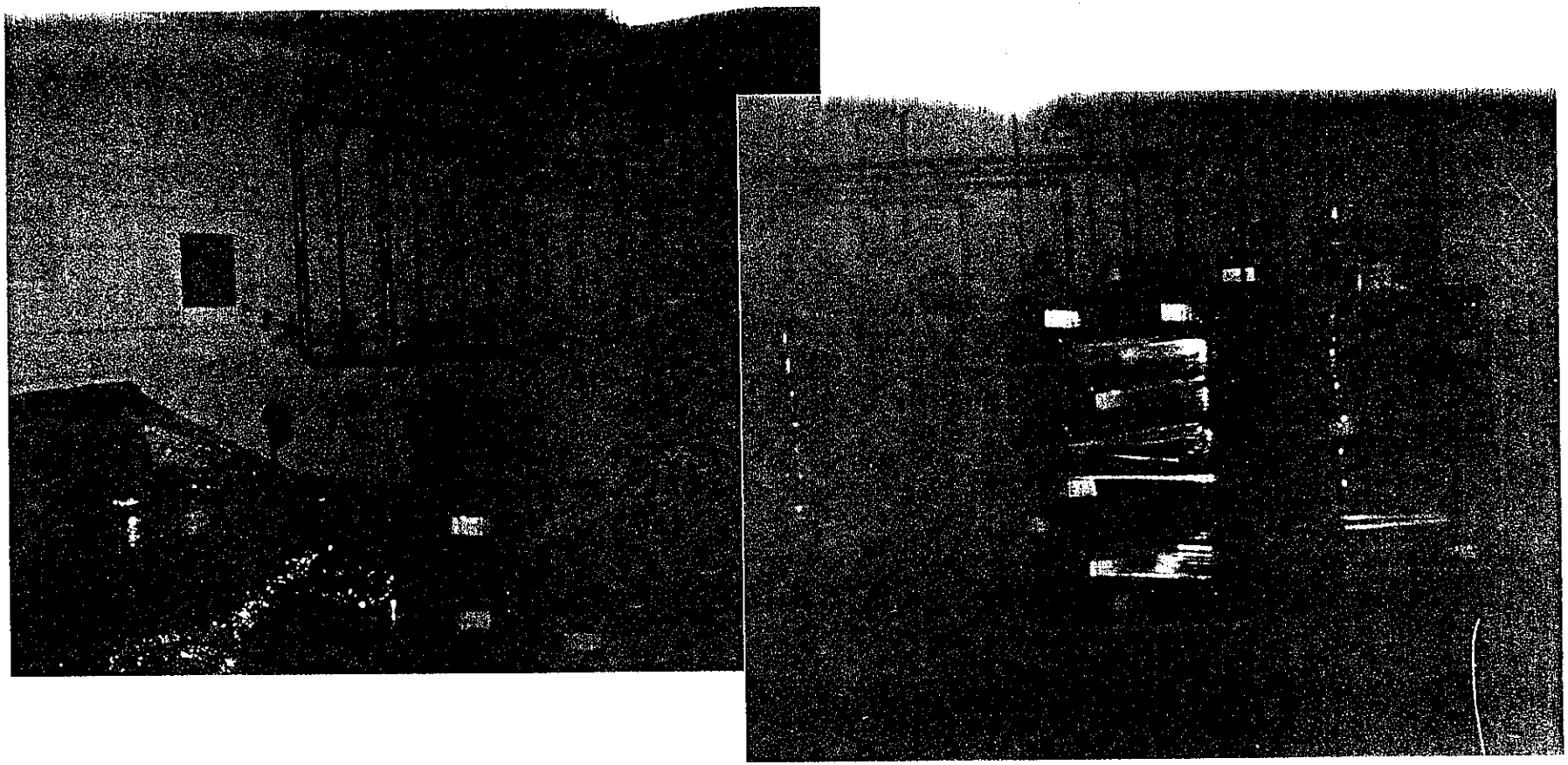


Photo #5
Former hazardous waste storage area
facing southwest



Photos #6, #7
Pan of former pump room (now tire storage) facing southwest

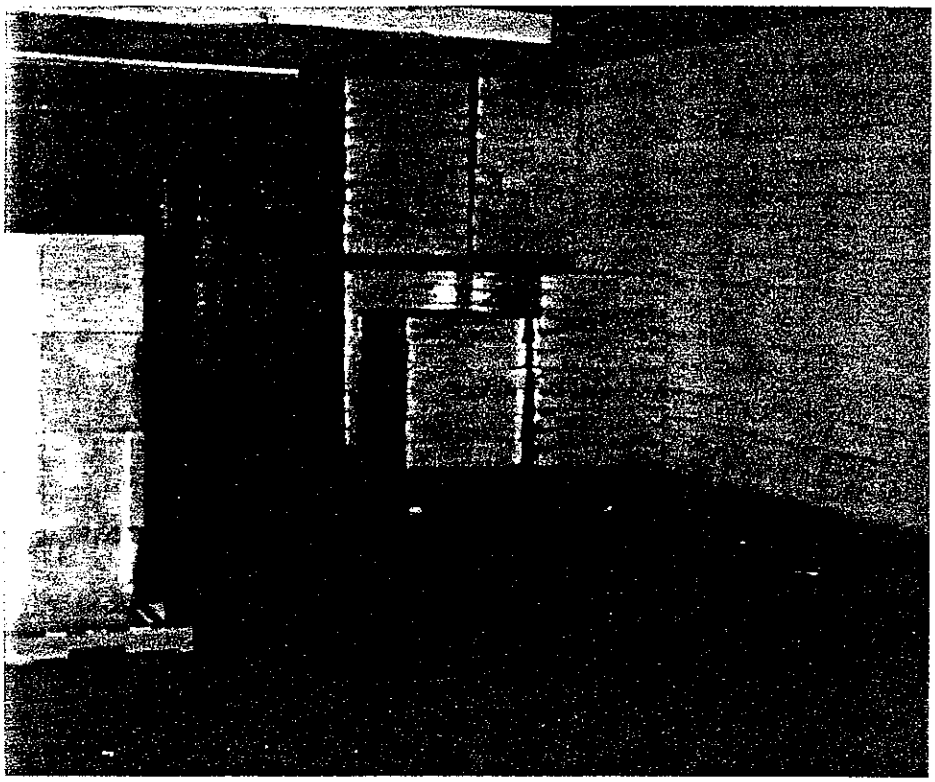


Photo #8
Shot of former end compound tanks room facing northwest

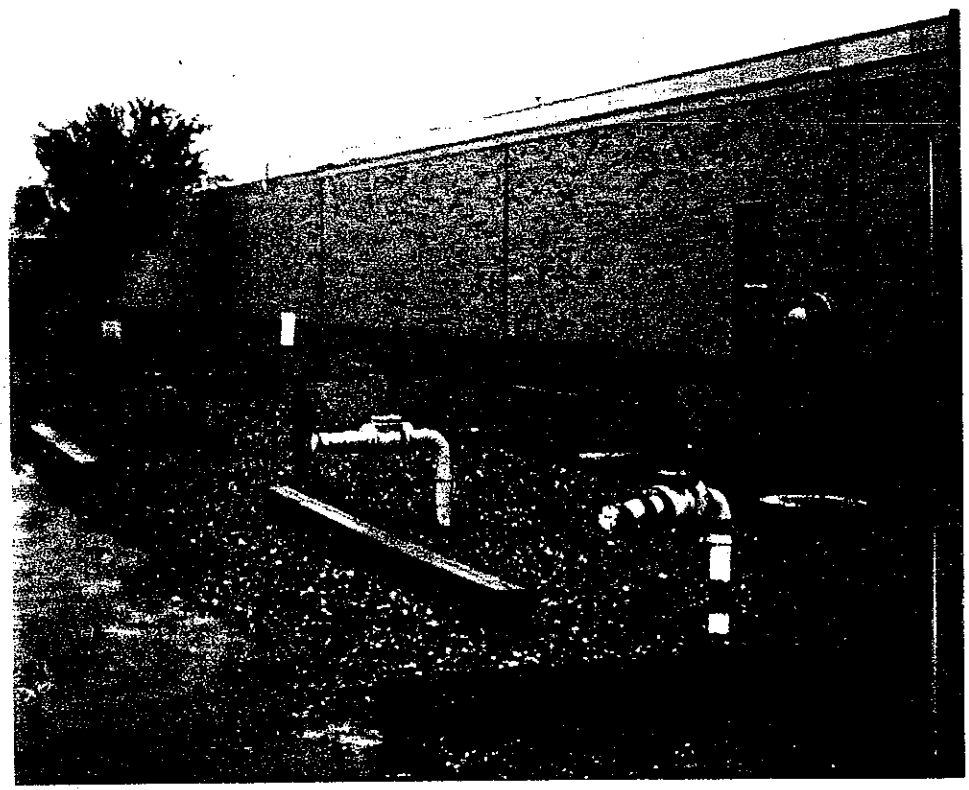


Photo #9
Close-up of location of underground storage tanks facing northeast

F3-8903-38

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
PA	2454

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
National Can Corporation	Newford Mill Road				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Morrisville	PA	19067	Bucks	017	PA08
09 COORDINATES LATITUDE	LONGITUDE				
40° 09' 35" N	74° 46' 07" W				

10 DIRECTIONS TO SITE (Starting from nearest public road)

Travel east on the Pennsylvania Turnpike to exit 29. Travel north on Route 13 approximately 2-1/4 miles. Make a right, go over a bridge, and continue to the first traffic light. Turn left onto Bristol Pike. At the fork in the road, bear right onto Bordentown Road. Cross Van Sciver Lake; make a left onto Newford Mill Road. The site is 1/4 mile ahead on the right.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)			
U.S. Steel Corporation	Fairless Hills Industrial Park			
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**	
Morrisville	PA	19067	(215) 736-4203	
07 OPERATOR (If known and different from owner)	**08 STREET** (Business, mailing, residential)			
Eastern America, Incorporated	8501 Hegerman Street			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**	
Philadelphia	PA	19136	(215) 333-4444	

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: 11 / 14 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES ☐ NO DATE 5 / 5 / 89 (MONTH DAY YEAR)

BY (Check all that apply)

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): NUS Corporation, FIT 3

02 SITE STATUS (Check one)

☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1967 (BEGINNING YEAR) 1983 (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Solvents including methyl ethyl ketone, methyl isobutyl ketone, hexane, mineral spirits, toluene, and unknown vinyls, primers, varnishes, and oils.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

There is possible groundwater contamination from underground storage tanks, which are currently intact. It is unknown whether they contain materials, but evidence of spillage was observed during the site visit.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)		03 TELEPHONE NUMBER
Paul J. Racette	U.S. EPA		(215) 597-1073
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Donna McKeever	NUS	FIT 3	(215) 687-9510	5 / 5 / 89 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

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POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
PA	2454

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: approx. 756/3 miles — 04 NARRATIVE DESCRIPTION

There is the possibility for groundwater contamination if underground storage tanks, which are currently intact, contain materials and are leaking. Stained soil was observed at several locations at the site. As no municipal wells are located within three miles of the subject site, the population on groundwater was determined by a house count of areas not serviced by a public water supplier and multiplying that number by 3.8 (persons per home).

01 [ ] B. SURFACE WATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 34/1 mile — 04 NARRATIVE DESCRIPTION

Wastes handled by National Can Corporation were removed by 1983; however, signs of spillage were observed during the site visit. The nearest surface water that receives drainage from the site is located 3/4 mile south-southeast of the site.

01 [ ] C. CONTAMINATION OF AIR — 02 [ ] OBSERVED (DATE: _____) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None known or reported; wastes handled by National Can Corporation were removed by 1983.

01 [X] D. FIRE/EXPLOSIVE CONDITIONS — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: < 50/1 mile — 04 NARRATIVE DESCRIPTION

There is a possible hazard if underground storage tanks still contain materials and are disturbed and exposed to fire or explosive conditions.

01 [X] E. DIRECT CONTACT — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: < 50 — 04 NARRATIVE DESCRIPTION

Signs of spillage at the underground storage area and the drum storage pad were observed during the site visit. It is unknown whether materials are still contained in underground tanks. Access is unrestricted in these areas.

01 [X] F. CONTAMINATION OF SOIL — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 AREA POTENTIALLY AFFECTED: < 1/10 (Acres) — 04 NARRATIVE DESCRIPTION

Signs of spillage at the underground storage area and the drum storage pad were observed during the site visit. It is unknown whether materials are still contained in underground tanks or if tanks are leaking.

01 [X] G. DRINKING WATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: approx. 756/3 miles — 04 NARRATIVE DESCRIPTION

The nearest residential area not supplied with municipal water is located 1-1/2 miles northwest of the site. There is a possibility of groundwater contamination if underground storage tanks, which are currently intact, contain materials and are leaking. Stained soil was observed at several locations at the site. Population on groundwater was determined as mentioned above (A).

01 [X] H. WORKER EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 WORKERS POTENTIALLY AFFECTED: < 50 — 04 NARRATIVE DESCRIPTION

Signs of spillage at the underground storage area and the drum storage pad were observed during the site visit. It is unknown whether materials are still in underground tanks or if the tanks are leaking. Access to these areas is unrestricted.

01 [X] I. POPULATION EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE: _____) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 7,860/3 miles — 04 NARRATIVE DESCRIPTION

The population potentially affected includes those using groundwater and surface water, workers at the site, trespassers to the site, and those people having direct contact with a contaminated area.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
PA	2454

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- [ ] A. SOLID
- [ ] B. POWDER, FINES
- [X] C. SLUDGE
- [ ] D. OTHER (Specify) _____
- [ ] E. SLURRY
- [X] F. LIQUID
- [ ] G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS: unknown
CUBIC YARDS: unknown
NO. OF DRUMS: unknown

03 WASTE CHARACTERISTICS (Check all that apply)

- [X] A. TOXIC
- [ ] B. CORROSIVE
- [ ] C. RADIOACTIVE
- [ ] D. PERSISTENT
- [ ] E. SOLUBLE
- [ ] F. INFECTIOUS
- [X] G. FLAMMABLE
- [X] H. IGNITABLE
- [ ] I. HIGHLY VOLATILE
- [ ] J. EXPLOSIVE
- [ ] K. REACTIVE
- [ ] L. INCOMPATIBLE
- [ ] M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	unknown		All waste was removed from the site by
OLW	OILY WASTE	unknown		1983. It is unknown whether six
SOL	SOLVENTS	> 25	tons/yr.	underground storage tanks still contain
PSD	PESTICIDES			materials. Waste amounts are taken
OCC	OTHER ORGANIC CHEMICALS	130	tons/yr.	from the Part A Permit Application.
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	130	tons/yr.	

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	methyl ethyl ketone	unknown	outside drum storage/ tank	unknown	unknown
SOL	methyl isobutyl ketone	unknown	outside drum storage/ tank	unknown	unknown
SOL	hexane	unknown	outside drum storage/ tank	unknown	unknown
SOL	toluene	108-88-3	outside drum storage/ tank	unknown	unknown
MES	lead	7439-92-1	outside drum storage	unknown	unknown
SOL	mineral spirits	unknown	outside drum storage	unknown	unknown

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	same materials as above		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

NUS FIT 3. Preliminary assessment; site visit. TDD No. F3-8903-38, May 5, 1989.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
PA	2454

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported or observed.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

None reported or observed.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported or observed.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES (Spills, runoff, standing liquids, leaking drums) — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 7,860/3 miles — 04 NARRATIVE DESCRIPTION

It is unknown whether underground storage tanks, which are currently intact, still contain materials or are leaking. No secondary containment exists for the tanks. Specifics about containment and materials handled at some former storage locations are unknown. Stained soils were observed in two of these areas.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported or observed.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

No storm drains were observed during the site visit. An on-site septic system is used by the current leasee of the building.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None reported or observed.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None reported or observed.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 7,860 within 3 miles

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

NUS FIT 3. Preliminary assessment; site visit. TDD No. F3-8903-38, May 5, 1989.
United States Geological Survey. Trenton West, Pennsylvania - New Jersey Quadrangle, 7.5 Minute Series. Topographic Map. 1955, photorevised 1970.

SECTION 6

6.0 REFERENCES FOR SECTIONS 1.0 THROUGH 5.0

1. United States Geological Survey. Trenton West, Pennsylvania - New Jersey Quadrangle, 7.5 Minute Series. Topographic Map. 1955, photorevised 1970. Combined with Trenton East, Pennsylvania - New Jersey Quadrangle, 7.5 Minute Series. Topographic Map. 1957, photorevised 1981; Bristol, Pennsylvania - New Jersey Quadrangle, 7.5 Minute Series. Topographic Map. 1955, photorevised 1981; and Columbus, New Jersey Quadrangle, 7.5 Minute Series. Topographic Map. 1957, photorevised 1981.

2. NUS Corporation, FIT 3. Preliminary assessment; site visit. TDD No. F3-8903-38, May 5, 1989.

3. Peters, Judith, American National Can Company, with Donna McKeever and Carl Rodzewich, NUS FIT 3. Meeting. May 5, 1989.

4. Massaro, Herb, Eastern America, Incorporated, with Donna McKeever and Carl Rodzewich, NUS FIT 3. Meeting. May 5, 1989.

5. Rollins Burdick Hunter Company Engineering Service. National Can Corporation Facility Map, Plant No. 39, Morrisville, Pennsylvania. April 1974.

6. Rivetna, R.M. National Can Corporation, to the United States Environmental Protection Agency (Region III). Correspondence. August 15, 1980.

7. United States Environmental Protection Agency. Notification of Hazardous Waste Activity. Environmental Protection Agency Form 8700-12 (6-80). August 4, 1980.

8. Rivetna, R.M. National Can Corporation, to the United States Environmental Protection Agency (Region III). Correspondence. August 15, 1980.

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16. Rivetna, R.M., National Can Corporation, to Gary Bonner, Pennsylvania Department of Environmental Resources. Correspondence. April 11, 1984.

17. Lunsk, Lawrence H., Pennsylvania Department of Environmental Resources, to R.M. Rivetna, National Can Corporation. Correspondence. July 19, 1984.

18. Pennsylvania Department of Environmental Resources, Bureau of Community Environmental Control. Sanitary Survey Form for Lower Bucks County Joint Municipal Authority. August 10, 1983.

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20. Cole, Henry M., Executive Director, Township of Falls Authority, to Garth Glenn, NUS FIT 3. Correspondence. June, 1987.

21. Pennsylvania Department of Environmental Resources, Bureau of Community Environmental Control. Sanitary Survey Form for Morrisville Borough Authority. October 29, 1986.

22. Wilhelm, John, Superintendent, Morrisville Borough Authority, with David Doran, NUS FIT 3. Telecon. July 20, 1987.

23. Chamberlain, Jeffrey, Production Superintendent, Pennsylvania - American Water Company, with David Doran, NUS FIT 3. Telecon. July 20, 1987.

24. Russo, Richard A., General Superintendent, Trenton Water Works, with David Doran, NUS FIT 3. Telecon. July 27, 1987.

25. Cawl, Betty, Bordentown (New Jersey) Water Company, with Lisa Lillis, NUS FIT 3. Telecon. November 24, 1987.

26. Olevich, Robert, Superintendent, Florence Water and Sewer Authority, with Charles Meyer, NUS FIT 3. Telecon. January 27, 1986.

27. United States Geological Survey. Trenton West, Pennsylvania - New Jersey Quadrangle, 7.5 Minute Series. Map of Flood-Prone Areas. 1955.

28. Greenman, D.W., D.R. Rima, W.N. Lockwood, and H. Meisler, Pennsylvania Geological Survey. Groundwater Resources of the Coastal Plain Area of Southeastern Pennsylvania. Bulletin W13, 1961.

29. Wolfe, Peter E. Landscapes of the Coastal Plain. In The Geology and Landscapes of New Jersey. New York: Crane, Russak and Company. 1977.

30. Pennsylvania Department of Environmental Resources, Bureau of Topographic and Geologic Survey. Atlas of Preliminary Geologic Quadrangle Maps of Pennsylvania. Trenton West, Pennsylvania Quadrangle. 1981.

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34. United States Department of Agriculture, Soil Conservation Service. Soil Survey of Bucks and Philadelphia Counties, Pennsylvania. July, 1975.

35. United States Department of Commerce. Climatography of the United States. Local Climatological Data, Philadelphia, Pennsylvania. 1983.

36. Uncontrolled Hazardous Waste Site Ranking System; A User's Manual. One-Year, 24-Hour Rainfall (inches) (figure 8); Mean Annual Lake Evaporation (inches) (figure 4). August 1982.

37. National Can Corporation, Fairless Facility. Drum Storage Area Photographs. Photocopied November 1980.

38. Kulp, Charles J., United States Department of the Interior, Fish and Wildlife Service, to Garth Glenn, NUS FIT 3. Correspondence. June 7, 1989.

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